

EXHIBIT 17

Case: 17-03283-LTS Doc#: 17441 Filed: 07/20/21 Entered: 07/21/21 10:05:23 Desc: Main
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Wednesday, July 14, 2021
Carolina, Puerto Rico

Secretaria (Clerk Office)
Tribunal de Distrito de los Estados Unidos
(United States District Court)
Sala 150 Edificio Federal (Federal Building)
San Juan, Puerto Rico 00918-1767

Re: Zulma Landrau Rivera
Address: Ruta Rural 1 Box 35
Carolina, Puerto Rico 00983
Tel. No. 787-938-0715
Case No. 29313
Social Security: 5174

Dear Clerk:

I wish to have this honorable court reconsider my claim for a salary adjustment as per the judgment, for my claim not to be dismissed, and to be secured. I have been waiting to receive the salary adjustment owed to me for around 10 years.

Furthermore, I have filed an appeal with the Department of the Family for a salary adjustment on the basis of merit and interest. I request that they evaluate and adjust my pension, social security, and any other debt pending to date.

I wish to remain an active party in the case under the PROMESA Act, that my claim be considered, as well as reviewed and secured so that I am paid what I am owed for all of these years.

Please find evidence attached. May justice be served.

Thanking you in advance,

Sincerely,

[signature]
Zulma Landrau Rivera

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Case:17-03283-LTS Doc#:17105-2 Filed:06/18/21 Entered:06/18/21 18:59:34 Desc:
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Three Hundredth and Forty First Omnibus Objection
Exhibit A: Claims to be Dismissed

Claims to be dismissed						Residual claim				
	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT
83	RIVERA, ZULMA LANDRAU RR 1 BOX 35 CAROLINA, PR 00983	05/22/18	17 BK 03566-LTS / Employees' Retirement System of the Government of the Commonwealth of Puerto Rico	29313	Undetermined*	RIVERA, ZULMA LANDRAU RR 1 BOX 35 CAROLINA, PR 00983	05/22/18	17 BK 03566-LTS / The Commonwealth of Puerto Rico	23761	Undetermined*

Reason: Duplicate claim for obligation filed against the Debtor, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted claims, if any, would be between the plaintiff and the Commonwealth of Puerto Rico.

Claims to be dismissed						Residual claim				
	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT
84	RODRÍGUEZ GONZÁLEZ, TANYA PO BOX 13871 SAN JUAN, PR 00908-3871	05/24/18	17 BK 03566-LTS / Employees' Retirement System of the Government of the Commonwealth of Puerto Rico	18897	Undetermined*	RODRÍGUEZ GONZÁLEZ, TANYA PO BOX 13871 SAN JUAN, PR 00908-3871	05/24/18	17 BK 03566-LTS / The Commonwealth of Puerto Rico	19945	Undetermined*

Reason: Duplicate claim for obligation filed against the Debtor, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted claims, if any, would be between the plaintiff and the Commonwealth of Puerto Rico.

Claims to be dismissed						Residual claim				
	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT
85	RODRÍGUEZ HERNANDEZ, ROBERTO CALLE 60 21 20 URB. METROPOLIS CAROLINA, PR 00987	06/13/18	17 BK 03566-LTS / Employees' Retirement System of the Government of the Commonwealth of Puerto Rico	60053	Undetermined*	RODRÍGUEZ HERNANDEZ, ROBERTO CALLE 60 21 20 URB. METROPOLIS CAROLINA, PR 00987	06/13/18	17 BK 03566-LTS / The Commonwealth of Puerto Rico	56020	Undetermined*

Reason: Duplicate claim for obligation filed against the Debtor, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted claims, if any, would be between the plaintiff and the Commonwealth of Puerto Rico.

Claims to be dismissed						Residual claim				
	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT
86	RODRÍGUEZ LOPEZ, RAQUEL PO BOX 7307 CAROLINA, PR 00986-7307	05/22/18	17 BK 03566-LTS / Employees' Retirement System of the Government of the Commonwealth of Puerto Rico	24589	\$48,821.92	RODRÍGUEZ LOPEZ, RAQUEL PO BOX 7307 CAROLINA, PR 00986-7307	05/22/18	17 BK 03566-LTS / The Commonwealth of Puerto Rico	28152^	\$48,821.92

Reason: Duplicate claim for obligation filed against the Debtor, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted claims, if any, would be between the plaintiff and the Commonwealth of Puerto Rico.

^ Claim no. 28152 also included in Exhibit A to Omnibus Objection No. 345 for incorrectly classified claims

Claims to be dismissed						Residual claim				
	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT
87	RODRÍGUEZ RODRÍGUEZ, CARLOS R CALLE 3 856 URB. SAN MARTÍN PATILLAS, PR 00723	05/25/18	17 BK 03566-LTS / Employees' Retirement System of the Government of the Commonwealth of Puerto Rico	24512	Undetermined*	RODRÍGUEZ RODRÍGUEZ, CARLOS R CALLE 3 856 URB. SAN MARTÍN PATILLAS, PR 00723	05/25/18	17 BK 03566-LTS / The Commonwealth of Puerto Rico	45793	Undetermined*

Reason: Duplicate claim for obligation filed against the Debtor, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted claims, if any, would be between the plaintiff and the Commonwealth of Puerto Rico.

* This indicates that the claim contains amounts pending payment or undetermined amounts

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Three Hundredth and Forty First Omnibus Objection
Exhibit A: Claims to Be Dismissed

Claims to be dismissed						Residual claim				
	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT
79	RIVERA ENCARNACIÓN, MADELINE PO BOX 20135 SAN JUAN, PR 00928-0135	05/23/18	17 BK 03566-LTS / Employees' Retirement System of the Government of the Commonwealth of Puerto Rico	19439	Undetermined*	RIVERA ENCARNACIÓN, MADELINE PO BOX 20135 SAN JUAN, PR 00928-0135	05/23/18	17 BK 03566-LTS / The Commonwealth of Puerto Rico	20306^	Undetermined*

Reason: Duplicate claim for obligation filed against the Debtor, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted claims, if any, would be between the plaintiff and the Commonwealth of Puerto Rico.

^ Claim no. 20306 also included in Exhibit A to Omnibus Objection No. 351 for incorrectly classified claims

Claims to be dismissed						Residual claim				
	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT
80	RIVERA RODRÍGUEZ, NAYDA URB. VISTAMAR 162 CALLE CATALINA CAROLINA, PR 00983-1843	05/08/18	17 BK 03566-LTS / Employees' Retirement System of the Government of the Commonwealth of Puerto Rico	13675	\$39,000.00*	RIVERA RODRÍGUEZ, NAYDA URB. VISTAMAR 162 CALLE CATALINA CAROLINA, PR 00983-1843	05/08/18	17 BK 03566-LTS / The Commonwealth of Puerto Rico	12341	\$39,000.00*

Reason: Duplicate claim for obligation filed against the Debtor, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted claims, if any, would be between the plaintiff and the Commonwealth of Puerto Rico.

Claims to be dismissed						Residual claim				
	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT
81	RIVERA TORRES, JOSÉ J. B-11 URB. TIERRA SANTA VILLALBA, PR 00766	05/29/18	17 BK 03566-LTS / Employees' Retirement System of the Government of the Commonwealth of Puerto Rico	45585	Undetermined*	RIVERA TORRES, JOSÉ J. B-11 URB. TIERRA SANTA VILLALBA, PR 00766	05/29/18	17 BK 03566-LTS / The Commonwealth of Puerto Rico	43761	Undetermined*

Reason: Duplicate claim for obligation filed against the Debtor, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted claims, if any, would be between the plaintiff and the Commonwealth of Puerto Rico.

Claims to be dismissed						Residual claim				
	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT	NAME	DATE FILED	CASE/DEBTOR NO.	CLAIM NO.	CLAIM AMOUNT
82	RIVERA VELÁZQUEZ, WANDA I. URB. VILLA SERENA – BUZON 76 SANTA ISABEL, PR 00757	06/05/18	17 BK 03566-LTS / Employees' Retirement System of the Government of the Commonwealth of Puerto Rico	48391	Undetermined*	RIVERA VELÁZQUEZ, WANDA I. URB. VILLA SERENA – BUZON 76 SANTA ISABEL, PR 00757	06/05/18	17 BK 03566-LTS / The Commonwealth of Puerto Rico	56103	Undetermined*

Reason: Duplicate claim for obligation filed against the Debtor, the Employees' Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted claims, if any, would be between the plaintiff and the Commonwealth of Puerto Rico.

* This indicates that the claim contains amounts pending payment or undetermined amounts

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Mailing Address:
RR 1 BOX 35
Carolina PR, 00983
787-983-0715

October 5, 2020

Hon. Orlando López Belmonte
Secretary, Department of the Family

Warm greetings to you.

RE: REQUEST FOR "STATUS" OF APPEAL FOR A CORRECTION OF PAYMENTS UNDER THE ZULMA
LANDRAU V. THE DEPARTMENT OF THE FAMILY CASE, K PE 2005-0608

I recently saw, on a list extracted from the PRIMECLERK PROMESA website, which contains the names of all plaintiffs (including the Zulma Landrau Rivera case), the amount appropriated to me in said case: \$13,876.34.

It should be noted that, from that amount appropriated, one could infer that the Department of the Family in the last eight years has not at all considered the appeal I filed by way of a letter sent to Mrs. María L. Torres Colón, the Assistant Secretary for Human Resources and Industrial Relations, on November 9, 2012, a copy of which I have enclosed. No response or notice in relation to this letter was ever received from the Department of the Family regarding my appeal, which I thought was, in fact, under review. At the time, the gross amount of the claim was \$5,272.95, an amount equivalent to 25% of total pay; I later deducted the social security and pension contributions withholdings from this amount. The above figure of \$13,876.34 represents less than the remaining 75% that they alleged to have owed me.

In summary, as I explained in my 2012 letter, my appeal is based on the fact that my colleagues at Technical Assistance, who are now retired and had a service and classification history similar to mine, have received compensation pursuant to this claim well in excess of what I have received (up to three times as much) according to my information at the time, and which was confirmed to me again upon seeing the list mentioned above.

I will send a copy of this letter to Ms. Glenda Gerena Rios, the Administrator at ADFAN, in case she is able to provide assistance with this matter or part thereof.

[Handwriting reads: *[illegible]* – October 9, 2020 – 3:55pm]

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I wish to have my application received, and to be informed of (or have delivered to me) the calculations performed in relation to my case. I hope that this decision is re-evaluated, and for justice to be done for me. When I filed my appeal in 2012, a copy was sent to the attorneys who represent plaintiffs and to Pro-Sol (the union). I will also send a copy of this letter to these parties.

Kind regards,

[signature]

Zulma Landrau Rivera

SS xxx-xx-5174

Cc: Ms. Glenda Gerena Rios, Administrator ADFAN

Enclosure: Copy of request for appeal; November 9, 2012

Copy of pension readjustment request

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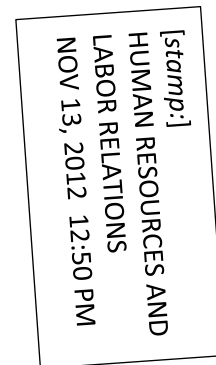
November 9, 2012

María L. Torres Colón

Assistant Secretary, Human Resources and Industrial Relations

RE: Nilda Agosto Maldonado

CIVIL case no. KPE 2005-0608



The purpose of this letter is to request an appeal in relation to the payment received on November 9, 2012, as I am not in agreement with it.

In 1979, I joined the Agency as a temporary employee and, in 1989, I became a regular employee (Technical Service Assistant). It is worth noting that there are employees who started at the Agency recently or who have been in the employ of the Agency for less time but have received much more.

I need my file to be reviewed: in my 31 years with the Agency, I have only ever received five-year increment raises.

In light of the foregoing, I hereby file an appeal on the grounds that I do not agree with the amount received.

[signature]

Zulma Landrau Rivera

Family Technical Service Assistant

Carolina I

(Postal address: RR 1 Box 35, Carolina, PR 00983)

Cc: **Ivonne González Morales, Esq.**

PO Box 9021828

San Juan, PR 00902-1828

Milagros Acevedo Colón

Cond. Colina Real

2000 Ave. Felisa Rincon

Box 1405

San Juan, PR 00926

Manuel Díaz Lugo

PO Box 9020192

San Juan, PR 00902-0192

[Handwriting reads:] This letter is to inform you that I have filed an appeal and that I am owed this amount, plus interest

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DEPARTMENT OF THE FAMILY

Office of the Assistant Secretary for
Human Resources and Industrial Relations

COPY

[signature-] S. Perez Nov. 13 2:10pm

November 2, 2012

Landrau Rivera, Zulma
Family and Children Administration

Re: Nilda Agosto et al. KPE-2005-0608

Dear colleague:

You are named as a plaintiff in the case of Nilda Agosto et al. versus the Department of the Family in relation to the Federal Minimum Wage.

Notwithstanding the above, and with a view to reducing the debt that is the product of a claim filed in 2005, the Puerto Rico Office of Management and Budget has identified entries in the savings of the Department of the Family to credit you pursuant to the claim in question. Please find enclosed with this letter a check for the sum of \$5,272.95, an amount equal to 25% of the total payment to which you are entitled in accordance with the stipulations of the judgment. Only social security and contributions are being deducted from this check.

We recognize that this advance payment does not represent payment for the full amount owed, but a payment made in good faith in order to reduce the amount owed.

If you do not agree with the amount received, you will have 10 days in which to file a claim with the Office of the Assistant Secretary for Human Resources and Industrial Relations.

Cordially,

[signature]

María Luisa Torres Colón
Auxiliary Clerk

Edificio Lila Mayoral, Ave. Barbosa 306
P O Box 11398, San Juan, PR 00910-1398 / Tel. (787) 294-4900 Exts: 2358 / 2359 / Fax (787) 765-1743

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JUDGMENT
K PE 2005-0608
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307. HERNANDEZ MENDOZA, ZORAIDA	308. HERNANDEZ MORALES, ARMANDO
309. HERNANDEZ ORTIZ, ELBA N.	310. HERNANDEZ RAMIREZ, CARMEN DEL S.
311. HERNANDEZ RIOS, MYRIAM	312. HERNANDEZ RIVERA, MARIA I
313. HERNANDEZ RIVERA, RAMON	314. HERNANDEZ RODRIGUEZ, UBALDO
315. HERNANDEZ SOTO, GILMA M.	316. HERNANDEZ TORRES, ROSA T.
317. HERNANDEZ VALLEJO, ADOLFO	318. HERNANDEZ VAZQUEZ, MIGDALIA
319. IRIZARRY FRASQUERI, WILFREDO	320. JIMENEZ OLIVIERI, ALINA
321. JIMENEZ PIMENTEL, IVIS I.	322. JOUBERT Tanco, AWILDA
323. LACEN REMIGIO, JULIA A.	324. LANDRAU RIVERA, ZULMA
325. LASALLE CONCEPCION, MARIA S.	326. LEBRON DELGADO, ELSA
327. LEBRON LEBRON, MARY	328. LEON DAVILA, CARMEN ANA
329. LOPEZ BURGOS, MARILYN J.	330. LOPEZ CAMACHO, EVELYN
331. LOPEZ CORDERO, ZULMA A.	332. LOPEZ ESCALERA, NATASCHA
333. LOPEZ FLORES, IVAN	334. LOPEZ LUGO, ISABEL MARGARET
335. LOPEZ QUILLES, ILEANA	336. LOPEZ RAMOS, MARIA J.
337. LOPEZ RAMOS, ZULMA	338. LOPEZ RODRIGUEZ, SANDRA I.
339. LOPEZ SANTOS, MARIA DE LOS A.	340. LOPEZ VAZQUEZ, MARITZA
341. LORENZANA ACOSTA, LYDIA	342. LORENZO DE EFRERE, ROSA J.
343. LOZADA AQUINO, SANTA A.	344. LOZADA DE HERNANDEZ, MARIA I.
345. LOZADA ORTIZ, RAUL	346. LOZADA RODRIGUEZ, MARGARITA
347. LUGO MALDONADO, NORMA I.	348. LUGO PEREZ, VIVIAN
349. LLANOS CARRION, LUIS M.	350. LLANOS SANCHEZ, CARMEN L.
351. MACHADO DE LA ROSA, ANA L.	352. MAISONET LOPEZ, ALEJANDRO
353. MALAVE CARDENALES, JOSE M.	354. MALDONADO COLON, MARGARITA
355. MALDONADO MEDINA, BLANCA E.	356. MALDONADO REYES, YOLANDA
357. MALDONADO RIVERA, YOLANDA	358. MANGUAL RAMIREZ, ELIZABETH
359. MANSO CEPEDA, JUANA E.	360. MANZANO MELENDEZ, MINERVA
361. MARCANO CUADRADO, MYRIAM	362. MARCANO FIGUEROA, WILLIAM
363. MARINA RIVERA, ORLANDO	364. MARRERO COLON, AILSABEL
365. MARRERO MUNICH, NOELIA	366. MARRERO REYES, ESTEBAN
367. MARTINEZ CORDERO, CARMEN	368. MARTINEZ CRUZ, RIGOBERTO
369. MARTINEZ DIAZ, MARIA C.	370. MARTINEZ MARTINEZ, ARACELIS
371. MARTINEZ MERCED, CARMEN SONIA	372. MARTINEZ NUÑEZ, CARMEN L.
373. MARTINEZ ROSARIO, SANTOS A.	374. MARTINEZ SANCHEZ, ANA IVETTE
375. MARTINEZ UMPIERRE, MARIA DEL C.	376. MARTINEZ VAZQUEZ, PEDRO
377. MARTINEZ VELAZQUEZ, CARLOS	378. MATANZO PEREZ, MARIA R.
379. MATIAS MATIAS, ROSA D.	380. MATIAS NIEVES, LAURA E.
381. MATOS CRUZ, ADELAIDA	382. MATOS CRUZ, YOLANDA
383. MATOS ORTIZ, SONIA E.	384. MATOS SANCHEZ, MARIA E.

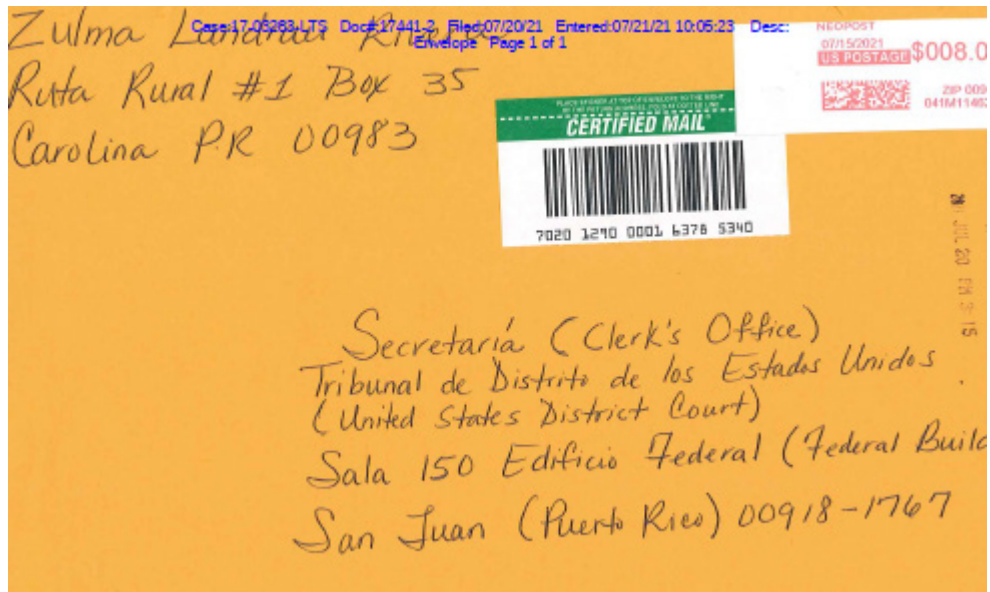
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IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
RIVERA, ZULMA LANDRAU	29313	5/22/2018	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$0.00
Reason:	Duplicate liability filed against Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Commonwealth of Puerto Rico.			

SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES SOLICITAN QUE SU RECLAMO SEA RECHAZADO POR LA RAZÓN INDICADA AQUÍ ABAJO.

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
RIVERA, ZULMA LANDRAU	29313 X	5/22/2018	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	\$0.00
Base para:	Reclamo de una obligación duplicada interpuesto contra el Sistema de Retiro de Empleados del Gobierno del Estado Libre Asociado de Puerto Rico. Todas las responsabilidades invocadas, si las hubiere, tendrían lugar entre el Reclamante y el Estado Libre Asociado de Puerto Rico.			





T 718.384.8040
W TargemTranslations.com
E projects@targemtranslations.com
A 185 Clymer St. Brooklyn, NY 11211

TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 29313 ECF No. 17441**

Signed this 17th day of August 2021



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor

